

The logo for Intellihub, featuring the word "intellihub" in a white, lowercase, sans-serif font. A small white star is positioned above the letter "i". The background consists of large, overlapping, semi-transparent circles in various shades of blue and teal.

# Simplify your energy transition.

2023 Modern Slavery Statement  
12.12.2023

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# Introduction

Modern slavery is one of the most complex and important human rights challenges of our time. According to the International Labour Organisation, the term modern slavery covers a set of legal concepts, including forced labour, debt bondage, slavery of children and human trafficking.

Modern slavery is an umbrella term to refer to situations of exploitation that an individual cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power.

At Intellihub, we do not tolerate modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain.

This statement sets out the actions that the Intellihub Group has taken to understand and address potential modern slavery risks related to our business.

## The Intellihub business

### Structure

The Intellihub Group is made up of privately held Australian and New Zealand companies, employing over 360 people across offices in Sydney, Melbourne, Hobart, Brisbane, Auckland, Hamilton and Tauranga.

### Operations

The Intellihub Group is a utility services company that delivers innovative metering and data solutions to maximise digital and new energy services.

We are an experienced and leading provider of multi-utility services for residential, commercial & industrial, embedded network and solar metering customers. Our core business is the installation, operation, and maintenance of smart electricity meters.

We are rapidly growing our behind the meter business and are working with a range of stakeholders to help households and businesses better optimise electricity consumption. This includes the electrical load from household energy appliances such as solar, batteries, water heating, electric vehicle charging, pool pumps and other household appliances. Through our cloud-based DER software we provide the control and data management required for virtual power plant participation.

### Consultation

As part of preparing this statement, we consulted with executive leaders and directors for the reporting entities within the Intellihub Group who have reviewed and approved the content.

Our consultation included review by the directors of our subsidiary companies both within Australia and in New Zealand. All our subsidiaries are required to follow the same policies and processes despite not being reporting entities or, in the case of



our New Zealand subsidiary, not directly being subject to the Australian Modern Slavery legislation.

In addition, this statement has been approved on 12 December 2023 by the Board of Directors of Spark Investment Holdco Pty Ltd as the parent entity for the Intellihub Group and its reporting entities.

## **Governance**

We are committed to embedding human rights considerations into decision-making, our policies and governance framework. Members of executive leadership and our Board formally review and approve Intellihub policies.

Our executive leaders and Board were also intimately involved in creating and endorsing our ESG Framework, which we have recently reviewed and updated. The ESG Framework provides the basis for ongoing efforts to meet our commitments to partner and work with our suppliers to combat modern slavery and human trafficking and improve working conditions.

## **Reporting entities**

This Modern Slavery Statement is provided on behalf of the following reporting entities within the Intellihub Group:

- ◆ Spark Investment Holdco Pty Ltd, ACN 626 001 394
- ◆ Spark Investment Midco Pty Ltd, ACN 626 002 248
- ◆ Intellihub Holdings Pty Ltd, ACN 626 003 236
- ◆ Intellihub Australia Pty Ltd, ACN 626 079 614
- ◆ Intellihub Metering Pty Ltd, ACN 105 423 541



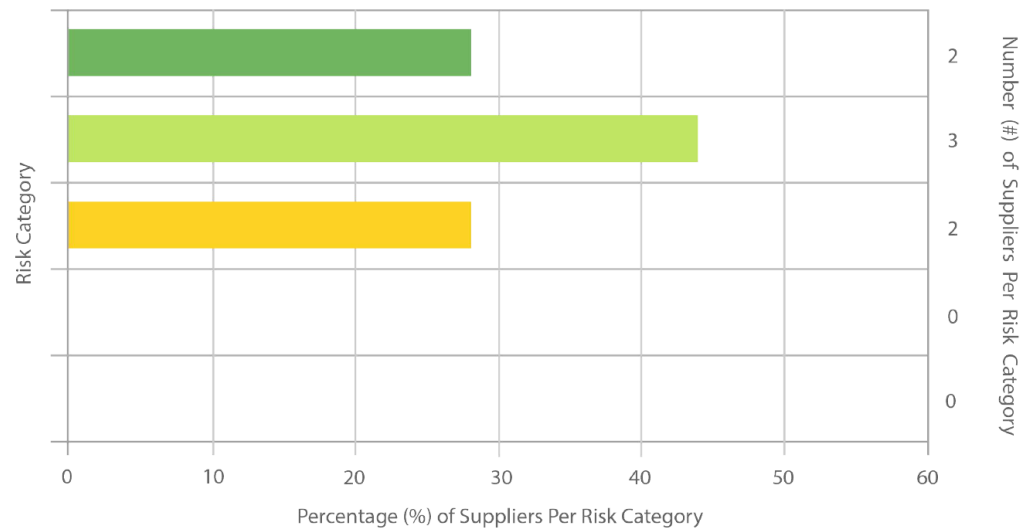
# Assessing our risk

## Summary

We have assessed the risk of modern slavery of our Tier 1 suppliers. The assessment found that the majority of our Tier 1 suppliers (71.5%) have a low risk of modern slavery.

We have identified that two companies in our Tier 1 supply chain (representing 28.5% of our Tier 1 suppliers) have a medium risk of modern slavery with partial risk controls in place. In 2024, we will work with these suppliers to increase their risk controls to mitigate the risks of modern slavery to a low level.

From our assessment we do not consider any of our Tier 1 suppliers present a high risk of modern slavery.



| Risk categories                            | % of suppliers per risk category | # of suppliers per risk category |
|--|----------------------------------|----------------------------------|
| ■ Low-Risk (No inherent risk)              | 28.5%                            | 2                                |
| ■ Low-Risk (Adequate risk control)         | 43%                              | 3                                |
| ■ Medium-Risk (Partial risk control)       | 28.5%                            | 2                                |
| ■ High-Risk (Inadequate risk control)      | 0%                               | 0                                |
| ■ High-Risk (High levels of inherent risk) | 0%                               | 0                                |



## Our assessment methodology

We have engaged a third party to help us conduct a detailed assessment of the risks of modern slavery in our supply chain.

The assessment has been conducted in line with the Social Responsibility Alliance's Slavery & Trafficking Risk Template. This is a global standard for assessing modern slavery risks.

The assessment included an examination of the risks inherent to a supplier's operations, and the risk that remains after accounting for modern slavery risk controls that have been implemented.

As of the date of this Statement, we have assessed our Tier 1 suppliers' risks of modern slavery. Our Tier 1 suppliers are defined with reference to our annual expenditure along with their importance to our business.

In 2024, we will incrementally assess our other suppliers against this framework.

## Inherent risks

We have determined each of our Tier 1 suppliers' inherent risk by asking which countries, regions, sectors and high-risk goods are part of their operations, production or supply chain.

### Countries of operation

Our supply chains include major global suppliers with operations around the world, including manufacturing locations in Indonesia, China and Malaysia.

As part of our risk assessment, we have considered whether the countries where our suppliers operate fully meet the U.S Trafficking Victims Protection Act's (TVPA) minimum standards. The TVPA minimum standards are minimum standards for the elimination of trafficking that are applicable to the country of origin, transit, or destination.

Our risk assessment found that some of our Tier 1 suppliers do have operations in countries which have not fully met the TVPA minimum standards.

### Sectors of operation

As part of providing our customers with metering services and data solutions, our supply chain includes suppliers spanning the following major spending categories:

- ◆ Smart metering and communications devices, and associated equipment which we primarily own and install, allowing us to provide metering services to our customers who are overwhelmingly electricity retail businesses.
- ◆ Smart metering device installation, and maintenance services, provided by qualified electrical field service technicians.
- ◆ Software, data, mobile connectivity, telecommunications, and other information technology services enabling our technology platform and allowing us to provide metering and other data services to our customers.
- ◆ General operations and corporate services, including freight/shipping, legal services, insurance, office information technology and support.



As part of our risk assessment, we have considered whether the sectors where our supply chain operate, produce and/or source goods in one or more of the sectors identified in the Global Estimates of Modern Slavery as a sector with a high risk of forced labour exploitation. The Global Estimates of Modern Slavery is a report prepared by the International Labour Organisation, Walk Free and the International Organisation for Migration that estimates the number of people in situations of modern slavery.

Our risk assessment found that the majority of our Tier 1 supply chain operate, produce and/or source goods in a sector with a high risk of forced labour exploitation. The sectors identified include manufacturing, retail, transportation and storage, and wholesale.

As a company that purchases a large volume of smart metering and communication devices, we consider that the main modern slavery risk in our supply chain comes from exposure to product manufacturing supply chains. Accordingly, it is important that our Tier 1 suppliers have adequate controls in place to mitigate and manage this risk.

## Risk controls

The assessment also included an examination of the risk controls (including policies, processes, and procedures) each of our Tier 1 suppliers have in place to mitigate and manage their inherent risks, including:

- ◆ Implementation of a modern slavery screening and evaluation policy
- ◆ Implementation of a modern slavery vulnerability assessment policy
- ◆ Implementation of a policy prohibiting charging recruitment fees
- ◆ Undertaking modern slavery risk mitigation training
- ◆ Issuing modern slavery policies to suppliers

For each Tier 1 supplier the assessment considered whether inadequate, partial or adequate risk controls are in place to manage modern slavery risks.

The assessment found that we do not have any companies in our Tier 1 supply chain that have inadequate risk controls in place. The majority of our Tier 1 suppliers (71.5%) have adequate risk controls. Two suppliers, representing 28.5% of the Tier 1 supply chain, have partial risk controls.

Each of our Tier 1 suppliers has been given an action plan that contains additional risk controls that can be considered. If implemented, these risk controls will further reduce the risk of modern slavery.

In 2024, we will work with two of our suppliers that have been identified as having partial risk controls to support them implement the additional risk controls in their action plans.



# Our actions

## Our modern slavery policies

Our policies communicate the Intellihub Group's values and expectations, setting standards for ourselves and our partners while making clear that we do not tolerate modern slavery. These policies demonstrate our strong stance against modern slavery and include our:

- ◆ Environmental Social Governance (ESG) Framework
- ◆ Modern Slavery Policy
- ◆ Code of Conduct
- ◆ Whistle-Blower Policy

Our ESG Framework sets out our goals and commitments in relation to combatting modern slavery and gives us a pathway forward to follow which supports and requires responsible sourcing, a safer workplace, helps drive zero emissions and enables each of us and everyone involved in our operations and supply chain to thrive.

In particular, our ESG Framework directly addresses modern slavery under the Responsible Sourcing pillar. Our ambition is to ensure we are partnering for social impact across our value chain, with specific targets and actions, including:

- ◆ Updating our Procurement Policy to incorporate modern slavery considerations.
- ◆ Identifying modern slavery risks within our supply chain and implementing actions to mitigate the risk.
- ◆ Providing ongoing training to our employees to recognise the signs of modern slavery and know how to effectively respond if confronted with a suspected modern slavery issue.

Our Modern Slavery Policy contains a set of principles, requirements and processes that govern how we mitigate the risk of modern slavery in business. In 2024 we will review the Policy to ensure the principles, requirements and processes reflect our current business structure and are fit for purpose to address the modern slavery risks of our current operations and supply chain.

Our Code of Conduct, which, amongst other things specifically addresses Modern Slavery. It is publicly available on our website and to our employees via our intranet.

We have also begun the process of reviewing and updating our Procurement Policy. Although this policy was not finalised in 2023, this work will continue in 2024 and is an area for action under our ESG Framework.



## Our contracting policies

As part of our ongoing efforts to address the risks of modern slavery in our supply chain, we are committed to ensuring that appropriate contractual protections and obligations are included in new supply and procurement agreements.

This includes ensuring our supply and procurement agreements incorporate drafting requiring our suppliers comply with all relevant modern slavery laws and provide assurances around their practices and our expectations. Our robust provisions and protections ensure accountability and compliance around modern slavery, including:

- ◆ Taking reasonable steps to identify, assess and address risks of modern slavery practices in the operations and supply chains used (including any third party), and
- ◆ Assurances that no form of forced, compulsory or slave labour is used.

In addition to the above controls, where we identify non-compliance with modern slavery obligations by our suppliers, we have internal documents and guidelines setting out further investigation assessment questions for vendors and remediation guidance.

## Training

We provide ongoing training to our employees to recognise the signs of modern slavery and know how to effectively respond if confronted with a suspected modern slavery issue. In the 2023 reporting period 96% of employees received modern slavery training.

## Tracking our performance

We are monitoring the effectiveness of our processes and procedures to address the modern slavery risks of our business.

We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance processes.

Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.





## Approval and signature

The Intellihub Group's Modern Slavery Statement has been approved by the Board of Directors of Spark Investment Holdco Pty Ltd as the parent entity and principal governing body for the Intellihub Group and its reporting entities.

**Cameron Blanks, Director, Spark Investment Holdco Pty Ltd**



**12 December 2023**

This is a joint modern slavery statement made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth).

It constitutes the joint modern slavery statement of Spark Investment Holdco Pty Ltd, Spark Investment Midco Pty Ltd, Intellihub Holdings Pty Ltd, Intellihub Australia Pty Ltd and Intellihub Metering Pty Ltd for the reporting period 1 July 2022 to 30 June 2023.

This modern slavery statement addresses each of the mandatory criteria for content set out in section 16 of the *Modern Slavery Act 2018* (Cth).

